

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)
)
Joseph R. Sundo,) Case No. 20-20214 GLT
Debtor(s)) Chapter 13
) Related Docket No.
)
)
Joseph R. Sundo,)
Movant(s))
)
vs.)
)
PennyMac Loan Services, LLC,)
Respondent(s))

**OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE RE: CLAIM
NO. 13**

AND NOW, comes the Debtor, Joseph R. Sundo, by and through his attorney Kenneth Steidl, and Steidl and Steinberg, Attorneys at Law, and respectfully represent as follows:

1. This case was commenced on January 20, 2020 when the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Joseph R. Sundo is the Debtor in the above-captioned proceeding and is the Movant in this motion.
3. The Respondent filed a Notice of Mortgage Payment Change on December 22, 2022.

4. The Respondent's Notice of Mortgage Payment Change states that the Debtor's will escrow payment from \$354.36 to \$612.64, effective February 1, 2023.
5. The information contained in the Respondent's escrow analysis is insufficient for the Debtor to determine if the increase in the payment is warranted specifically an explanation as to why the actual payout for city tax, hazard insurance, and MIP/PMI was so much higher than was estimated.

WHEREFORE, the Debtors, Joseph R. Sundo, respectfully request this Honorable Court to grant his objection to the Respondent's Notice of Mortgage Payment Change.

Respectfully submitted,

January 13, 2023
DATE

/s/ Kenneth Steidl
Kenneth Steidl, Esquire
Attorney for the Debtors

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